

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JASON C. CALLICOTTE, *et al*,  
(SPN 01401470)

*Plaintiffs,*

vs.

ED GONZALEZ, *et al*,  
*Defendants.*

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CIVIL ACTION NO. 4:20-cv-1369

JUDGE CHARLES ESKRIDGE

**PLAINTIFFS' FIRST ADVISORY**

Pursuant to this Honorable Court's order appointing the undersigned counsel in Document 18, Plaintiffs respectfully advise the Court that there is a matter they believe warrants prompt attention.

On Tuesday, June 30, the undersigned counsel saw educational material aimed at preventing the spread of Covid-19 bearing Harris County's name posted in the Office of the Harris County Attorney's parking lot. The undersigned has received several independent reports that these educational materials are not available to inmates at the Harris County Jail and that there have been no efforts to educate inmates therein concerning Covid-19. The undersigned is currently unaware of any reason these educational materials printed by Harris County are posted in the County Attorney's parking lot but not in the jail.

Plaintiffs continue to believe this warrants prompt attention, particularly given their relevant request for injunctive relief (*see* Dkt. 1, p. 7 at ¶ 20(d); *see also* Dkt. 30, pp. 5-6 at ¶ 20(d)) and the following statements from Harris County policymakers on Twitter:

- County Judge Lina Hidalgo (May 4, 2020) - "220 sheriff's deputies associated with the jail have tested positive for #COVID19. Over 1/10 of ALL #COVID cases in our county are linked to the jail. Our efforts to reduce jail population were always about protecting our community & law enforcement from a ticking time bomb."  
<https://twitter.com/LinaHidalgoTX/status/1257429165604831233>.
- Sheriff Gonzalez (March 29, 2020) - "It's impossible to practice social distancing and heightened hygiene when 8,000 people are detained in a close space. #COVID19 is extremely contagious and spread through the air and from contaminated surfaces. When one person tests positive, there will be dozens more within a day or two. If even 20% of the jail population is infected, and that is a conservative estimate, it will overwhelm the jail's limited resources."  
[https://twitter.com/SheriffEd\\_HCSO/status/1244413888608849921](https://twitter.com/SheriffEd_HCSO/status/1244413888608849921).

The undersigned counsel has also received several independent reports that inmates (1) do not have access to (a) hand sanitizer, (b) anti-bacterial soap, (c) paper towels, or (d) adequate cleaning supplies (*see* Dkt. 1, pp. 7-8 at ¶ 20 (f); *see also* Dkt. 30, p. 6 at ¶ 20(f)) and (2) receive one cotton mask every two weeks. Requests concerning these issues have been presented to Harris County through agreed informal but expedited discovery and Harris County has represented that it is compiling responses thereto.

Respectfully submitted,

By /s/ William Pieratt Demond  
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ATTORNEY FOR PLAINTIFFS

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon Defendants' counsel via email.

/s/ William Pieratt Demond  
William Pieratt Demond